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**ASTM PHASE I
ENVIRONMENTAL SITE ASSESSMENT**

**SWANK PROPERTY
6-17 HAZEL STREET
ATTLEBORO, MASSACHUSETTS**

May 16, 2006

Prepared for:

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EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment (ESA) for the property located at 6-17 Hazel Street, Attleboro, MA was performed by Environmental Strategies & Management, Inc. (ES&M) on behalf of the City of Attleboro Redevelopment Authority. The ESA also included three other parcels of land adjacent to the main facility at 6-17 Hazel Street. The Phase I ESA was performed in accordance with ASTM recommended practices and included a review of reasonably ascertainable federal, state, and local government records; an interview with a Swank employee who currently maintains the facility and is very knowledgeable about the property; and a property reconnaissance survey. The purpose of conducting this environmental site assessment is to identify, to the extent feasible (pursuant to the processes prescribed in the ASTM Standard Practice for Environmental Site Assessments: Phase 1 Environmental Site Assessment Process), recognized environmental conditions in connection with the subject property. The goal of this assessment is to meet all appropriate inquiry into the previous ownership and use of the property consistent with good commercial or customary practice, in order to identify recognized environmental conditions in connection with the subject property. The term recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release into structures on the property or into the ground, ground water or surface water of the property.

The subject property (and adjoining properties) are currently owned by Swank, Inc., 656 Warner Blvd., Taunton, MA, and was utilized for jewelry manufacturing from the early 1900's until 1999 when decommissioning efforts were reportedly initiated. The primary parcel of land is identified on the Attleboro Assessors map as Lot 299 on Plat 42. This parcel is a 2.9 acre paved lot with two large interconnected buildings. A site reconnaissance survey was performed on March 23, 2006 and included a visual inspection of the exterior and interior of the facility. Mr. Jerry Kasner, the facility's maintenance supervisor, guided ES&M personnel and provided detailed information about the buildings and the former jewelry manufacturing operation. Several city offices were also visited to obtain additional information about the property.

The Phase I investigation revealed a recognized environmental condition on the subject property related to current and former underground and above ground storage tanks. Other issues were noted, such as potential PCBs in transformers on the property, and staining in several areas of the facility that are not recognized environmental conditions as defined by ASTM. There were also suspect recognized environmental conditions on properties in close proximity to the subject property. Based on information gathered from this investigation, conditions at these properties could have impacted the subject property; however, further investigation into the extent of contamination is required to determine this.

1.0 INTRODUCTION

This report presents the findings of a Phase I Environmental Site Assessment performed for the property at 6-17 Hazel Street, Attleboro, Massachusetts (herein after referred to as "the property"), by Environmental Strategies & Management, Inc. (ES&M) on behalf of the Attleboro Redevelopment Authority (ARA). This property is currently owned by Swank, Inc. (Swank) and also includes Lots 169, 170, 171, 172, 173, 174, 175, 176, 177, 263, 264, 265, 279, 280, 281, 299, 301, and 302 on Plat 42 of the Attleboro Tax Assessment Map. The Swank property was used in jewelry manufacturing from the early 1900's until 1999 when decommissioning activities reportedly began.

The site assessment was conducted in accordance with ASTM Standard E-1527-05, which outlines the standard practice for conducting an environmental site assessment for a parcel of commercial real estate. ASTM Standard E-1527-05 has been determined by the United State Environmental Protection Agency (USEPA) to be in full compliance with the requirements for conducting All Appropriate Inquiries (AAIs) specified in the recently published EPA rule, "Standards and Practices for All Appropriate Inquiries". The objective of the site assessment was to investigate recognized environmental conditions on the property using an appropriate level of inquiry as defined by ASTM E-1527-05, and to reduce the uncertainty regarding the potential for recognized environmental conditions. The contents of this report should not be relied upon by other parties without the express written consent of ES&M or the ARA.

The scope of work for the environmental site assessment included the following tasks:

- Review of federal, tribal, state and local government records/files;
- Completion of a visual inspection of the facility and of adjoining properties;
- Interview of people knowledgeable about the property including local officials; and
- Preparation of a written report documenting the findings of these tasks and including a declaration by the environmental professional.

2.0 SWANK SITE HISTORY

Several sources were used in researching the site history including two previously written Phase I Environmental Site Assessments by Marin Environmental Inc. and by Sage Environmental Inc.; a Swank promotional pamphlet from the 1980's; and newspaper articles from the Attleboro Sun on file at the Attleboro Public Library.

Samuel M. Stone and Maurice J. Baer founded the predecessor to Swank, Inc. when they started Attleboro Manufacturing Company in 1897. The company which manufactured ladies jewelry had its original plant at Union and Mill Street in Attleboro but a fire destroyed the entire block in May of 1898. Within days, the company then moved temporarily to a building adjacent to the subject property. Operations were moved in 1902 to a new facility which is part of the current subject property. In 1908 an associate

company called Baer & Wilde was formed to produce men's jewelry. During World War I, Baer & Wilde and Attleboro Manufacturing Company got involved in manufacturing items for the U.S. government (e.g. "dog tags")

In 1918 Baer & Wilde absorbed the Attleboro Manufacturing Company and ceased producing ladies jewelry to focus on men's jewelry. Around 1927 the name Swank was first introduced in advertisements and a merchandising plan involving several distributors across the country was initiated. By 1936 the distributors merged with Baer & Wilde to form Swank Products, which became Swank, Inc. around 1940.

During World War II the company again became involved with the war effort and manufactured tools used in producing small arms ammunitions. In 1944 the company manufactured Bronze Stars and Purple Hearts which were awarded to military heroes.

As the demand for Swank products increased so did the need for larger facilities. Several additions were completed over the years to add space to the original facility. A large two-story addition (Building 2) reportedly was built in 1946. A third story was added in 1948. Southern and northern additions were constructed between 1947 and 1963. These additions, which included extending Building 2 to Pearl Street, connecting it to the northern part of the original building, and adding additional stories to these additions, brought the facility to its current configuration of approximately 196,000 square feet. Manufacturing operations at the Site continued until 1999, when plant decommissioning efforts were initiated.

3.0 SITE DESCRIPTION

3.1 Site Location and Parcel Description

The subject property's address is 6-17 Hazel Street in Attleboro. The properties that comprise this Phase I include eighteen parcels of land identified as Lots 169, 170, 171, 172, 173, 174, 175, 176, 177, 263, 264, 265, 279, 280, 281, 299, 301, and 302 on Plat 42 of the Attleboro Tax Assessment Map (Figure 1). Lots 169-177 are located on the northeast corner of the intersection of Pearl Street and O'Neil Boulevard. Historic maps from the 1920s indicate that O'Neil Boulevard was named Speedway. The Polk City Directory in the 1950's referred to it as Brook Street. Lots 263-265 and 279-281 are located on the northwest corner of the intersection of Pearl Street and O'Neil Boulevard. Lot 299 is the sole parcel surrounded by Pearl Street to the north, O'Neil Boulevard to the east, School Street to the south, and Hazel Street to the west. Lot 301 and 302 are located at the southeast corner of the intersection of O'Neil Boulevard and School Street. Lot 302 is bounded to the south by East Street. The total area of these lots is approximately 6.6 acres. Buildings and production facilities have been located on Lot 299 since 1902.

The longitude and latitude coordinates (middle of Lot 299) are 71°16'38" and 41°56'23", respectively; UTM coordinates are Easting 311206.386 and Northing 4645378.234.

3.2 Site and Vicinity Description

According to the City of Attleboro Zoning Map, the subject property is industrial zoned and is surrounded primarily by other industrial use properties. There are also some residential properties in close proximity. Refer to Figure 6 for Site Vicinity Map.

3.2.1 Description of the Lots and Vicinity

Lot 299

Lot 299 is bounded by Hazel Street, O'Neil Boulevard, School Street and Pearl Street. The lot, which is approximately 2.9 acres in size, is paved and has two adjoining three-story buildings with a combined floor space area of approximately 196,000 square feet. The original building (designated as Building 1 or the west wing) was constructed at the turn of the century. The newer section (referred to as Building 2 or the east wing) was added in several different sections between 1945 and 1963. There are two cinder block sheds on the lot, and the entire lot is enclosed by chain link fencing.

Marathon Company is located on Lot 300, east of Lot 299 on the opposite side of O'Neil Boulevard. Marathon Company has been in the business of jewelry manufacturing since the 1940s. The Stearn Leach Building is located on Lots 282 and 283 just west of Lot 299 on the opposite side of Hazel Street. Stearn Leach is a manufacturer of precision rolled and drawn metal products. MS Company is located on Lots 297 and 298 just south of Lot 299 on the opposite side of School Street. To the south of MS Company is Supply New England (plumbing and heating supplies), Waste Management (solid waste handlers), Brask Industries (distribution and rental of compaction equipment), and HMS Industries (metal tooling, stamping, and design).

Lots 263-265 and 279-281

Lots 263-265 and 279-281 are comprised of 0.60 acres of paved land which are currently used as parking lots. In addition, an electric substation is situated on the southwest corner of Lot 279. To the west of Lot 279 are residential properties. Atwood Street is located to the north of Lots 263-265. Coast Atlantic Screen Process Inc. (screen printers) and BK Optical (glass grinding and machining shop) are located on the other side of Atwood Street to the north of Lots 263-265. Lima's Auto Repair is located to the west of Lot 265.

Lots 169-177

Lots 169-177 consist of 1.10 acres of paved land which are used for parking. Just north of these lots is Chellyn's Speedway Café and Children's Express Child Care center. North of this area and across Dunham Street is the Sturdy Memorial Hospital facility and associated parking areas. A separate property owned by Sturdy is located to the east of these lots.

Lot 301 and 302

Lot 301 is 0.46 acres in size and is improved with asphalt pavement. Lot 302 is 1.7 acres in size and its western side is paved and used for parking. The eastern side of Lot 302 is unimproved (grass and gravel) and is located adjacent to a wooded area. According to the Sampson & Murdock Company's City Directory for Attleboro, North Attleboro, and Plainville, Lot 301 was the location of Goss Laundry from around 1926 until around

1958. An advertisement in the directory dated 1929-1930 listed R. C. Simmonds as the proprietor and advertised the following: "Wet Wash, Hydro Dried, Semi-finished, Finished – the Most Sanitary Laundry in Attleboro". This is apparently the only development of the Swank-owned lots other than Lot 299. No other information was obtained regarding this former laundry facility.

O'Leary's Gym (gymnastics center) and Aanderaa Instruments (manufacturer of oceanographic equipment and meteorological instruments) are located to the east of Lot 302. Supply New England (plumbing and heating supplies), Perry Supply (manufacturer of concrete accessories), and The Moose Cabin Steak House are located on the lots to the south of Lot 302.

3.2.2 Site Physical Data

According to the United States Geological Survey (USGS), Attleboro, Massachusetts Quadrangle Topographic Map, the elevation of the Site is approximately 40 feet above NGVD. Topography is nearly level, sloping gently (<1% grade) to the east-southeast.

According to Flood Insurance Rate (FIRM) Map 250049-0005-C dated May 29, 1981, the Site is within an area designated as Zone C, indicating an area of minimal flooding.

The bedrock geologic map of Massachusetts indicates that bedrock beneath the Site is comprised of the Rhode Island formation, and is composed of sandstone, graywacke, shale and conglomerate. Surficial geology consists of sand and gravel deposits. According to the USDA Soil survey of Bristol County, the soil type consists of the Hinckley-Medisapristis-Windsor series which is excessively drained soil that formed on glacial outwash deposits.

Based on topography and drainage patterns, the inferred groundwater flow direction is east-southeasterly west of Thatcher Brook, and possibly southerly or west-southwesterly east of the brook.

A Massachusetts DEP Bureau of Waste Site Cleanup Site Scoring Map was obtained. This map, which provided the following information, is included as Figure 2. The subject property is not located within a potentially productive aquifer or a non-potential drinking water source area. It is also is not located within an EPA Sole Source Aquifer or the FEMA 100-year floodplain, or an area designated as Open Space. There are no public water supply areas within a half-mile radius of the subject property. Four small water features are mapped within the southeast area of the 0.5 mile radius of the subject property. A small section of the Ten Mile River runs within the northeast part of the half mile radius of the subject property. The Bungay River runs outside of the half mile radius to the northwest of the subject property. A small section of Thatcher Brook runs within the half mile radius (Thatcher Brook appears to run along O'Neil Boulevard in historic maps of the area but not on this Site Scoring Map). A fresh water wetlands area and a NHESP wetlands habitat are mapped within the southeast portion of the half mile radius of the subject property. Two small areas of protected open space fall just within the half mile radius of the subject property, one to the northwest and one to the

southwest of the subject property. A very small mapped wetland area is located to the east of the subject property, just within the half mile radius. No DEP permitted solid waste facilities or certified vernal pools appear on the Site Scoring Map.

3.3 Current Usage of the Property

The facility located on Lot 299 was decommissioned beginning in 1999. Currently there are no operations taking place at this facility. Jerry Kasner, a long-time employee of Swank Inc. maintains the building. The paved areas on the other lots are used for parking by employees of Stern Leach and Sturdy Memorial Hospital (Section 3.5 describes the license agreements allowing for this usage).

3.4 Past Usage of the Property

Several sources of information have been used in researching the past usage of the property including visits to local government departments, the Attleboro Public Library, the Attleboro Area Industrial Museum as well as reviewing available Sanborn Fire Insurance maps.

3.4.1 Sanborn Fire Insurance Map Coverage

ES&M reviewed available Sanborn™ Fire Insurance Maps to investigate the historic usage of the subject property. Sanborn maps are historic maps that were drafted for fire insurance purposes. Although the maps available for the area are often difficult to read, they do provide general information as to the prior use of the subject property and the surrounding area. Pertinent sections of the available Sanborn Fire Insurance Maps for the target area are included in Appendix A of this report. The following table summarizes the available maps:

Sanborn Fire Insurance Map Coverage in the Vicinity of the Site	
1899	The intersection of Hazel and School Streets is depicted on this map. Lot 299 is located in the eastern corner of this intersection and is labeled vacant, as is the parcel of land in the northern corner of this intersection. Dwellings are located on the parcel to the west of the intersection. The W.H. Wilmarth & Co. Jewelry Shop is depicted on the parcel to the south of the intersection. Separate buildings depicted on this parcel include an acid and charcoal house, another acid house, a bicycle shed, as well as an unlabeled structure.
1905	<p>The Attleboro Manufacturing Company is depicted on the location of Lot 299. The map indicates that three jewelry firms occupy this facility. Southeast of the main building is a separate building joined by a narrow structure. Although this map is difficult to read, later maps indicate this building is an engine room. To the east is an acid house and a gas house. To the southwest is another acid shed. To the northeast is a bicycle shed.</p> <p>Dwellings are located along the north side of Pearl Street as well as on the southwest corner of the intersection of School and Hazel Streets. The W.H. Wilmarth & Co. building continues to be depicted on the south side of School Street.</p>
1911	<p>Lot 299 of the Site is occupied by the Attleboro Manufacturing Company. Four jewelry firms apparently occupied the building at this time. A combined boiler room/engine room and attached coal shed is shown adjacent to the southeast portion of the main building. An auto house and a gas house are located east of the coal shed. Although not legible on this map, a later map more clearly indicates that a 1,000 gallon gas tank is depicted southeast of the gas house. A small structure is shown south of the boiler room; however, the label is illegible. West of this structure, a store house is shown. A vault is shown attached to the main building north of the store house. A bicycle shed is shown near the northeast corner of the property. The text on the map indicates that there is a 25,000 gallon water tank on the property.</p> <p>A grand stand occupies the parcel north of Pearl Street and west of O'Neil Boulevard (then Speedway). Dwellings are also located on the north side of Pearl St. Thatcher Brook is shown west of Speedway. The portion of the Site east of Speedway is undeveloped. Max Schweinschaut (owner) Jewelry Mfg. is indicated on the parcel of land on the south side of School Street.</p>
1916	The subject property is now labeled Sam Einstein (owner) Jewelry Mfg. The store house south of the main building on Lot 299 appears to

	<p>have been expanded. The unidentified building south of the boiler house is now expanded and identified as a "store house". To the south between the two store houses, an unidentified structure is shown. The gasoline tank between the gas and auto house is indicated as "buried". Remaining Site features are similar to the 1911 map.</p> <p>The site is depicted on a small inset on this map. Hazel and Pearl Streets are shown; however, the site boundaries on the south and east sides are not shown.</p>
1924	<p>Again the subject property is labeled Sam Einstein (owner) Jewelry Mfg. Lot 299 is shown similar to the 1916 map. The store house south of the main building has been expanded. The bicycle shed has been relocated southwest of its original location and a 12 car auto house has been built in its place. The original auto house appears to have a car port attached to its southern wall. Remaining portions of the Site appear similar to 1916.</p> <p>A portion of the brook is shown crossing beneath a bridge slightly to the north and south of Pearl Street and abutting Lot 299 to the east.</p>
1947	<p>The facility is identified as Swank, Inc. All outbuildings (i.e., store houses, auto houses, gas house and sheds) are no longer depicted. A new building identified as a two-story factory building (Building 2) has been added east of the main building which connects to the rear (engine room) portion of the boiler room and the main building. A partitioned storage building is located on the north end of the new building. A new structure is shown north of the main building near the northwest corner of Building 2. The coal shed is no longer present at the facility nor is the underground gasoline tank.</p> <p>The brook is shown similar to the 1924 map. MS Chain and The Robbins Company are identified on the parcel south of Swank Inc.</p>
1969	<p>Building 2 has expanded to the north and south and a third story has been added. A transformer house is shown on Pearl Street adjacent to Building 1 and 2. An aboveground tank and other exterior structures are shown opposite the west wall of Building 2 at the south end of the building. The 25,000 gallon water tank adjacent to Building 1 appears to have been replaced by a larger water tank and associated pump house located south of the boiler room and west of Building 2.</p> <p>MS Chain remains on the parcel to the south of the Site and Marathon Company is located east of the facility. The parking lot east of MS Chain remains unchanged as do the parking areas north and northeast of the facility. Thatcher Brook is no longer shown east of the facility; however, it is apparent along O'Neil Boulevard south of Maple Street.</p>

3.4.2 Additional Historic Map Coverage

In addition to the Sanborn Maps, ES&M also reviewed two other historical maps found in the Swank building (also included in Appendix A). The first is a Factory Insurance Association map for the property dated 1951. This map shows Buildings 1 and 2 as previously described for that time period. South of Building 1 and southwest of Building 2 are three fuel oil tanks (one 5,000 gallon and two 8,500 gallon). This map also shows an electrical substation on the parcel of land just north of Pearl Street. The second map is a Factory Mutual Engineering Association map dated 1977. Outside of the building footprints, this map shows the following features: a 3,000-gallon gasoline tank just south of the southwester corner of Building 1 and adjacent to Hazel Street; three fuel oil tanks (also shown on the 1951 map); a 125,000 gallon "suction tank" just east of the fuel oil tanks and formerly used to boost water pressure at the facility; a 120 gallon gasoline tank that apparently was associated with the water pumping system; a 1,000-gallon ammonia tank located along the western wall of Building 2; a hypochlorite tank located along the western wall of Building 2; and a trichloroethylene (TCE) tank located along the western wall of Building 2. A separate TCE tank is also shown along the eastern wall of Building 2 adjacent to O'Neil Blvd.

3.4.3 Chain of Title Research

The Attleboro Assessors' department was contacted to research the ownership history of the subject property. The following table documents the chain of title search results. Copies of the title cards as well as copies of title search documents provided by the User are included in Appendix B.

Chain of Title Search Findings Attleboro Assessors Department Swank, Inc. 7-16 Hazel Street			
Lot	Transfer Date	Grantee	Notes
Lot 169	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 140 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 170	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 134 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 171	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 133 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 172	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 134 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 173	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 130 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 174	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 131 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 175	1922	Associated Attleboro Mfg. Inc.	
	1945	Broadbent, John H. & Jennie E.	Previously Lot 141 on Plat 20.
	1948	Swank Inc.	
	1953		Reg. Land-Cert.#2000
Lot 176	1908	Finberg, Sadie	
	1931	Finberg, Joseph	
	1922	Attleboro Trust Co. & Wm. E. Lingard Executors	Previously Lot 142 on Plat 20
	1945	Broadbent, John H. & Jennie E. d/b/a Reliable Electric Plating Co.	
	1948	Swank Inc.	
Lot 177	1927	Leedham, James H. Jr. & Flora	
	1941	Leedham, Flora	Previously Lot 143 on Plat 20
	1947	Leedham, James H. III	
	1948	Swank, Inc.	
	1953		Reg. Land-Cert.#2000
Lot 263	Unknown	Robbins, C.M.	
	1912	Attleboro Trust Co.	
	1927	Leedham, James H. III	
	1945	Stone, Samuel M.	Was Lot 159 on Plat 22 (not changed until 1954)
	1948 & 1952	Swank, Inc.	Reg. Land-Cert.#2000
Lot 264	1910	Robbins, C.M.	
	1927	Augat, William	
	1938	Stone, Samuel M.	Previously Lot 158 on Plat 22 (not changed until 1954)
	1948 & 1952	Swank, Inc.	Reg. Land-Cert.#2000
	1953		Reg. Land-Cert.#2000
Lot 265	1927	Leedham, James H. Jr. & Flora	
	1941	Leedham, Flora	Previously Lot 157 on Plat 22
	1945	Stone, Samuel M.	
	1948	Swank, Inc.	
	1953		Reg. Land-Cert.#2000

Lot 279	Unknown	Robbins, C.M.	
	1912	Attleboro Trust Co.	
	1927	Augat, William	
	1938	Stone, Samuel M.	Previously Lot 162 on Plat 22
	1948	Swank, Inc.	
	1953		Reg. Land-Cert.#2000
Lot 280	Unknown	Robbins, C.M.	
	1911	Attleboro Trust Co.	
	1927	Augat, Albert A.	
	1937	Stone, Samuel M.	Previously Lot 161 on Plat 22
	1952	Swank, Inc.	
	1953		Reg. Land-Cert.#2000
Lot 281	Unknown	Robbins, C.M.	
	1912	Attleboro Trust Co.	
	1927	Augat, Albert A.	
	1937	Stone, Samuel M.	Previously Lot 160 on Plat 22
	1952	Swank, Inc.	
	1953		Reg. Land-Cert.#2000
Lot 299	Unknown	Einstein, Samuel M.	
	1927	Stone, Samuel M.	
	1941	Swank, Inc.	Was part of 171 and 172...
Lot 301	1931	Kendall, Gertrude et al	
	1926	Simmonds, Ralph c.	
	1958	Simmonds, Ralph C. Estate of	
	1961	Tax Lien (Book 1394, Page 157)	Previously Lot 69A on Plat 19
	1964	Swank, Inc. (Book 1454, Page 1051, Book 1454, Page 147)	Redemption
Lot 302	Unknown	Estes, Ralph C. Trustee	
	1922	Guild, Frank E.	
	1924	Panelon Underwear Co. Inc.	
	1924	Kendall, Walter M. et al	
	1924	Kendall, Walter M. Aldro A. French & Jos. F. Rioux	Previously Lot 69 on Plat 19
	1946	Kendall, Walter M. & Jos. F. Rioux	
	1946	Briggs, Bates & Bacon Co.	
	1955	Swank, Inc.	

ES&M obtained copies of Attleboro Assessors' field cards for each of the lots (included in Appendix C). The card for Lot 299 indicates a 2.9 acre parcel improved by a factory building with a gross area of 190,900 square feet. The card lists additions to the original building in 1946, 1948, and 1955. All other cards related to the subject property (i.e., near by Swank-owned lots) indicate that the parcels are vacant, asphalt-paved parking lots.

3.5 Historical and Current Usage of Nearby Properties

The property adjacent to Swank at 49 Pearl Street has been the location of various jewelry and jewelry supply manufacturers since the late 1800's. The J. M. Fisher Co. and Leach & Garner manufactured jewelry and jewelry supplies. Later, General Findings and Supply Co. manufactured rolled gold plate into sheet, wire, and seamless tubing. Then Leach & Garner conducted plating operations at this facility. Currently, Stern Leach manufactures precision rolled and drawn metal products at this facility.

Cobb's, an automotive repair shop was located at 15 Atwood Street between the late 1970's and the late 1980's. Currently Lima's Auto Repair is at this location.

81 O'Neil Boulevard has had various tenants over the years including Ralph Gunner Manufacturing Co., Superior Embedment (plastics), Mullaney Auto Repair, and Boulevard Used Cars. Throughout the 1990's, PM Silk Screen printers were located at this address. Currently, BK Optical, a glass grinding and machining shop is on this property.

83 Dunham Street is located just to the north of BK Optical. In the 1940's Bowen Brothers Electric Company manufactured automobile electrical components at this location. After that, Ralph Gunner Manufacturing Company was located at this address. Coast Atlantic Screen Process has been operating a screen printing company since the late 1980's.

Just across the street at 84 Dunham Street, Sweet Manufacturing Company produced jewelry prior to the 1960's. Later Electronics Metals & Alloys Inc., a division of Sweet Manufacturing, produced electrical equipment at this location. Since the 1970's, Checon has occupied this location manufacturing electrical contacts used in switches.

From the 1950's until the 1980's several companies occupied 52 Gardner Street. During this period, MacDonald Moving and Storage Company and Warehouse, Security Auto Rental and Ornamental Tube Company which manufactured brass tubing, were located at this address. This property was vacant in the 1980's and 1990's. Currently Chemet Corporation and Metalor Technologies USA are located at this address where they manufacture specialty metal products, notably silver flakes for use in adhesive conductors.

Sturdy Memorial Hospital was established in 1913 and is located at 211 Park Street. Sturdy Memorial also owned a parcel on the south side of Dunham Street. This location was occupied by Krew Inc. who manufactured military insignia and metal goods from the early 1950's. Part of this building is now a day care center called Children's Express.

The property to the south of Swank at 61 School Street has been occupied by MS Company since 1913. MS Company has been a manufacturer of jewelry, chains, and findings in gold, silver, and brass.

The property directly to the east of Swank at 90 O'Neil has been occupied by Marathon Company, a jewelry manufacturer, since the 1940's.

The property to the south of Marathon was the location of Goss Laundry from around 1926 until around 1958. The Sampson & Murdock City Directory first listed this business as being located at the corner of Speedway and School Streets. The address was later listed in the Polk City Directory as 98 Speedway and then 98 Brook Street. Brook Street is now known as O'Neil Boulevard.

The Attleboro Bowladrome was located east of Lots 301 and 302 in the 1950's. After that Martin's Gym operated a gymnastics program at this facility. Currently O'Leary's Gym and Aanderaa Instruments (manufacturer of oceanographic equipment and meteorological instruments), are located in this building.

Supply New England has been operating a plumbing supply company at 123 East Street since the 1940's just south of MS Company. The property across the street at 191 O'Neil Boulevard has had several automotive repair centers between the 1950's and the 1980's including Ray's Automotive Service, Jerry's Texaco, Ron's Texaco, and Speedway Service Center. New England Supply has used this address as an annex to their other building since the early 1980's.

Further south at 200 O'Neil Blvd. is Perry Machine Company, which has been in operation there since the early 1950's. The parcel of land to the south of this property has been a restaurant at least since the later 1960's. Behind this address at 189 East Street is the location of Glines & Rhodes, an assayer and refiner of precious metals since 1915.

The Robbins Company, a manufacturer of recognition awards and emblems for the past one hundred years is located at 400 O'Neil Boulevard.

3.6 Environmental Cleanup Liens against Property

No environmental cleanup liens against the subject property were discovered during the Phase I investigation. The Quitclaim Deed did indicate that the subject property is subject to:

1. Easements to Attleboro Steam and Electric Company, dated June 21, 1950 and June 22, 1950, recorded with the Bristol County (N.D.) Registry of Deeds at Book 1008 Page 343 and 344.
2. Parking License Agreement dated as of July 1, 2001 between Swank, Inc. and Stern Leach.
3. Parking License Agreement dated as of December 3, 2001 between Swank, Inc. and Sturdy Memorial Hospital.

4.0 RECORDS REVIEW

The site assessment included a review of reasonably ascertainable federal, state, and local records as described below. The Federal and State records were obtained using *Environmental FirstSearch™ Report* supplied by FirstSearch Technology Corporation. Appendix D includes a hard copy of the summary section of the FirstSearch Report and a complete copy of the FirstSearch Report on the compact disk (CD). Appendix C includes the City of Attleboro Assessors Card and Map.

4.1 Federal and State Records

In accordance with ASTM standards, ES&M reviewed the database information provided in the *FirstSearch™* report. The Federal and State database search included the following database lists:

Federal

- NPL - The EPA's National Priority List- confirmed or proposed Superfund Sites,
- CERCLIS - The EPA's Comprehensive Environmental Response Compensation and Liability Information System – current and potential Superfund sites currently or previously under investigation,
- CERCLIS-NFRAP - The EPA's Comprehensive Environmental Response Compensation and Liability Information System Archived Sites (Archive designation means that, to the best of the EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the NPL. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.),
- RCRIS – The EPA's Resource conservation and Recovery Information System database of registered hazardous waste generators and treatment, storage and disposal facilities,
- RCRA TSD - The EPA's Resource Conservation and Recovery Information System database of Treatment, Storage, and Disposal Facilities,
- RCRA COR - The EPA's Resource Conservation and Recovery Information System database of Corrective Action Sites,
- RCRA GEN - The EPA's Resource Conservation and Recovery Information System database of Large and Small Quantity Generators,
- ERNS - The EPA's Emergency Response Notification Site database,
- NPDES - The EPA's National Pollution Discharge Elimination System,
- Receptors – per 1995 Tiger census listing schools and hospitals that may house individuals deemed sensitive to environmental discharges due to their fragile immune systems.

State

- State Sites – The Department of Environmental Protection (DEP) database of confirmed, LTBI (Locations To Be Investigated), waiver, deleted and reserved sites maintained by the Bureau of Waste Site Cleanup,
- State Spills, 1990s Spills, 1980s Spills – The DEP database of emergency response actions and spill releases maintained by the Bureau of Waste Site Cleanup,
- Solid Waste Landfills - The DEP database of active solid waste landfill facilities maintained by the Division of Solid Waste Management,
- Registered UST –The Department of Public Safety/Office of the Fire Marshall's database of registered Underground Storage Tanks,
- Leaking UST.

The FirstSearch™ report revealed database records for the subject property as well as records for other nearby sites. The database search was conducted using the approximate center of the subject property to determine the distances between the subject property and each of the database findings. The Search Summary Report (included in Appendix D) provides an overview of the database findings for sites

located within the required search distances from the subject property. The database records for sites that fall within the approximate minimum search distance and have the potential to impact to the subject site are described below. Database records for sites further than one quarter mile were also not reviewed in detail. It is ES&M's experience that sites beyond this distance are not likely to have an adverse effect on the subject property (ASTM E-1527-05; p. 13).

Please note the following Massachusetts Department of Environmental Protection definitions that may be helpful in understanding the database search results:

Response Action Outcome (RAO): A site/release where an RAO Statement was submitted. An RAO Statement asserts that response actions were sufficient to achieve a level of no significant risk or at least ensure that all substantial hazards were eliminated. Class A and B RAOs document that a permanent solution has been achieved. Additional response actions are typically not required after the filing of a Class A or B RAO.

RAO Class A-1: A permanent solution has been achieved. Contamination has been reduced to background or a threat of release has been eliminated.

RAO Class A-2: A permanent solution has been achieved. Contamination has not been reduced to background.

RAO Class A-3: A permanent solution has been achieved. Contamination has not been reduced to background and an Activity and Use Limitation (AUL) has been implemented. An AUL is a deed restriction to ensure that future uses and activities at a property remain consistent with current uses and activities. For example, an AUL could require that an industrial property remain industrial, and not be developed in the future for residential use.

RAO Class A-4: A permanent solution has been achieved. Contamination has not been reduced to background and an AUL has been implemented. Contamination in soil above an applicable Upper Concentration Limit (UCL) is present at a depth of >15 feet or beneath an engineered barrier, but an evaluation has determined that it is not feasible to reduce concentrations below the UCL.

RAO Class B: Site assessment indicates that "no significant risk" exists. No remedial work was necessary.

RAO Class B-1: Remedial actions have not been conducted because a level of No Significant Risk exists.

RAO Class B-2: Remedial actions have not been conducted because a level of No Significant Risk exists, but that level is contingent upon one or more AULs that have been implemented.

RAO Class B-3: Remedial actions have not been conducted because a level of No Significant Risk exists, but that level is contingent upon one or more AULs that have been implemented. Contamination in soil above an applicable UCL is present at a depth of >15 feet or beneath an engineered barrier, but an evaluation has determined that it is not feasible to reduce concentrations below the UCL.

RAO Class C: A temporary solution. Although the site does not present a "substantial hazard," it has not reached a level of no significant risk. The site must be evaluated every five years to determine whether a Class A or Class B RAO is possible. All sites are expected eventually to receive a Class A or Class B RAO.

RTN: Release Tracking Number

4.2 Notable Database Findings

The Site:

The EPA Brownfield's database lists Swank Jewelers, ID 39259090-3, with no street address. 6-17 Hazel Street is also listed on the Brownfield's database with ID 69597560-1. Swank Inc. is listed on the AIRS database (ID MA0044092), and the FINDS database (MAD001202340). A separate FINDS database record (ID 110000311617) lists the following programs into which Swank is registered: RCRAINFO – MAD039960950 (the note states that the handler is not currently in any hazardous waste category); RCRAINFO – MAD001202340 (hazardous waste biennial reporter), small quantity generator; NEI (NEIMA0050087) criteria and hazardous air pollutant inventory; FRS (110000311617); TRIS (02703SWNKN6HAZE) as a Toxic Release Inventory Reporter; and AIRS/AFS (2512000087) as a minor discharger of air pollutants.

The RCRA Generator Site database lists Swank Inc. as a small quantity generator. The database lists three violations, all having been resolved. Swank is also listed on the RCRA NLR database.

The RUST database lists four registered underground storage tanks on this property. Three fuel oil tanks (one 5,000 gallon and two 8,500 gallon) have been removed and one 10,000 gallon fuel oil tank is still in use.

RTN 4-0014186 is identified with no location aid at 6 Hazel Street on the State Spills Site database. The record indicates that a release disposition and IRA plan was submitted on 9/21/98 for a release of 25 gallons of an unknown chemical. On 11/25/98 a release notification and a class A1 RAO was filed indicating that a permanent solution has been achieved. ES&M requested a file review for this RTN at the MassDEP; however, the file was not available. The RAO submittal and the later DEP audit which were included in Sage's Phase I report were reviewed. The audit confirmed that the RAO submitted for the site adequately demonstrated a condition of No Significant Risk to human health, safety, public welfare and the environment.

Nearby Locations:

Several databases include records for the property at 61 School Street, which is just south of the Lot 299. The FINDS Site database lists M&S Company as registered on the AFS/AIRS database. Another FINDS database record lists Leach & Garner Co. at this same address as a RCRIS site. The RCRA NLR database includes a record for Leach & Garner at this address.

RTN 4-18425, Right of Way, School St. and O'Neil Blvd., 0.07 miles southeast of the subject property: The state spills site database lists a Downgradient Property Status submittal dated 7/20/2005. This RTN was assigned following the release notification dated 5/12/2004. ES&M requested a file review for this RTN at MassDEP; however, the file was unavailable (it had been removed without being signed out by DEP staff). ES&M understands that this submittal was prepared on behalf of the Attleboro Redevelopment Authority.

Stern Leach, which is located 0.08 miles northeast of the subject property at 49 Pearl Street and is also referred to as Leach & Garner Co., is listed on several databases: FINDS Site, RCRA GEN (as a small quantity generator), TRIS, RUST (1 tank removed) and the State Site and State Spills Site databases. The State Site and State Spills Site databases list RTN 4-18710 for which a Phase II Scope of Work and Tier Classification were submitted to DEP on 10/4/2005. ES&M requested a file review for this RTN at MassDEP; however, the file was unavailable as it had been removed without being signed out by DEP staff.

Marathon Company Jewelers, 90 O'Neil Blvd., 0.08 miles southeast of the subject property, is listed on the following databases: FINDS Site, CERCLIS NFRAP, RCRA GEN (very small quantity generator).

Krew Inc., 101 Dunham Street, 0.10 miles northeast of the subject property, is listed on the following databases: FINDS, RCRA GEN (small quantity generator), RCRA NLR, TRIS, and 80'S State Spills Site. The 80's State Spill record referenced a release of between 50 and 100 gallons of #2 fuel oil from a UST in 1989.

Bowladrome, 182 East Street, is 0.12 miles southeast of the subject property. The State Spills Site database lists RTN 4-436 in reference to a release at this location in 1988. The status of the RTN is DEPNFA, which indicates that response actions were conducted and no further action was required by DEP.

Checon Corp., which is located 0.13 miles northeast of the subject property at 84 Dunham Street, is listed on the FINDS Site, RCRA Generator as a large quantity generator, and RCRA NLR databases.

Speedway Service Center is 0.13 miles southeast of the subject property at East St. and O'Neil Blvd. This site is listed on the RUST database with three 4,000 gallon steel underground storage tanks, all having been removed.

Glines and Rhodes, located at 189 East Street, 0.21 miles southeast of the subject property, has records on several databases including the TRIS, CERCLIS, FINDS, RCRA GEN (very small quantity generator), Brownfields, State Sites, and State Spills Sites databases. Records identifying releases at this location include:

- RTN 4-0012 was assigned to a release which occurred on 4/15/89. The site is in Phase IV of remediation. A Class C RAO was filed on 8/30/02 and a Tier Classification was published on 10/25/02. ES&M requested a file review for this RTN at MassDEP; however, the file was completely missing.
- S93-0488 pertains to a closed case involving the release of #2 fuel oil from an AST.

Stern Leach/Leach & Garner, located at 200 East St, 0.21 miles southeast of the subject property, has records on several databases including the TRIS, FINDS, RCRA GEN (small quantity generator), State Site, and State Spills Site databases. A release occurring on 8/15/87 was assigned RTN 4-189. A Tier 2 Classification was submitted on 3/15/2000 and a Class A2 RAO was submitted on 6/9/2004.

Chemet Corporation/Metalor Technologies, is located 0.19 miles northwest of the subject property at 52 Gardner Street. This property is referenced on several databases including the FINDS, TRIS, RCRA GEN (as a large quantity generator with 17 violations, all having been resolved), ERNS, Release, State Spills, and State Spills Sites databases. The following describes the records found pertaining to releases at this location:

- RTN 4-16939, identified with no location aid at 52 Gardner Street, is listed on the State Spills Site database. The record states that a release disposition was received by DEP on 3/11/02 and that a Class A1 RAO was submitted on 4/24/02.
- RTN 4-19293, also with no location aid, is listed on the State Spills Site database. The record states that DEP received a release disposition on 8/4/05 and an IRA statement on 12/13/05. The RTN is still unclassified.
- RTN 4-17491, listed with the name "Attleboro", is recorded on the State Spills Site database. The record states that a release disposition was received by DEP on 11/25/02 and that a Class A1 RAO was submitted on 1/24/03.
- RTN 4-18351, with no location aid, has records on the State Spills Site, State Site, and Release databases. All records reference a release of 300 gallons of process water to the storm system which occurred on 4/6/04 and the submittal of an IRA Completion Statement on 8/12/05. The State Site database lists the site as Tier 1D status; whereas the State Spills Site database lists the RTN as linked to a tier classified site (and therefore, RAO is not required).
- ID S93-0241 is identified on the State Spills Site and Release databases as Chemet, but the same release is listed with no name on the ERNS database. All records

identify a release of Nitric Oxide Gas on 4/8/93. The State Spills Site database lists the case as closed.

- ◆ RTN 4-10781 was assigned to a release of silver nitrate solution off a loading dock at 52 Gardner Street on 9/19/94. The release is identified on the State Spills Site database with the location as "Gardner Street Loading Dock". One ERNS database record lists the release site name as Chemet Corp. and another ERNS record lists no name. The Release database lists Chemet as the site name.
- ◆ RTN 4-16512 pertains to a release of hydrogen peroxide on 8/17/01. Records referring to this release were found on the Release and State Spills Site databases. The State Spills Site database record indicates that a Class A1 RAO was submitted on 5/24/04.
- ◆ RTN 4-13289 was identified on the State Site and State Spills Site databases. The records indicated that a release of hazardous material occurred on 8/15/97. The release was given Tier 2 Classification in 1998. A RAM Completion Statement was submitted on 6/17/02 and a Class C RAO was submitted on 6/6/05 indicating that a temporary solution has been achieved at the site.

4.3 MassDEP Records

On April 19, 2006, a review of the following available MassDEP files was completed.

RTN	Address	File Name	Summary
4-0014186	6 Hazel St	NO LOCATION AID	<ul style="list-style-type: none"> File documentation indicates a release of 45 gallons of #6 fuel oil from a ruptured fuel pump line occurred on September 21, 1998. A Class A-1 RAO was filed by Clean Harbors on November 25, 1998 for the release. A MADEP audit for this site was completed on March 25, 2000. The audit indicated that the Site was in compliance, and no additional response actions were necessary with regard to this RTN. During the time of the MassDEP file review, this file was not available.
4-0018425	School St & O'Neil Blvd	RIGHT-OF-WAY	<ul style="list-style-type: none"> Down-gradient Property Status submitted by the City Of Attleboro as a result of groundwater sampling results. During the time of the MassDEP file review, this file was not available.
4-0018710	49 Pearl St	NO LOCATION AID	<ul style="list-style-type: none"> A 120 day notification requirement was triggered on October 5, 2004 related to a release of 1,1-dichloroethene, 1,3,5-trimethylbenzene, 1,2,4-trimethylbenzene, and 2-propane. A Phase I - Initial Site Assessment was submitted on October 4, 2005. The site is classified as Tier II. During the time of the MassDEP file review, this file was not available.
4-0000012	189 East St	GLINES & RHODES	<ul style="list-style-type: none"> Investigations conducted by the USEPA indicated elevated concentrations of nickel, lead, cadmium, silver, cyanide, and zinc in on-site groundwater. A Class C RAO was submitted on August 30, 2002. During the time of the MassDEP file review, this file was missing.
4-0000189	200 East St	LEACH & GARNER	<ul style="list-style-type: none"> TCE was detected in groundwater in 1984.

		CO	<ul style="list-style-type: none"> A groundwater treatment system was in operation from October 31, 1986 to April 30, 1997. A Class A-2 RAO was submitted on December 21, 2001.
4-0016939	52 Gardner St	NO LOCATION AID	<ul style="list-style-type: none"> Approximately 150 gallons of hydrogen peroxide was released during the off-loading of a 250 gallon plastic tote. A Class A-1 RAO was submitted on April 24, 2002.
4-0019243	52 Gardner St	NO LOCATION AID	<ul style="list-style-type: none"> An assessment only IRA plan was submitted in August 2005 relating to the detection of elevated concentrations of cadmium and silver in the storm water drainage system. An IRA Status report was submitted in December 2005. All equipment that used cadmium was removed from the plant in September 2005.
4-0017491	52 Gardner St	ATTLEBORO	<ul style="list-style-type: none"> Approximately 10 gallons of sulfuric acid was released from a tanker hose during a delivery on December 23, 2002. A RAO was submitted by Clean Harbors on January 24, 2003.
4-0018351	52 Gardner St	NO LOCATION AID	<ul style="list-style-type: none"> File documentation indicates a release of 100-400 gallons of wastewater caused when a faulty solenoid valve filled two wastewater equalization tanks with city water, causing them to overflow into on-site storm drains. Elevated concentrations of copper, silver, and cadmium were detected in the storm drains. An IRA was completed. The IRAC report was submitted on August 12, 2005. This RTN was linked to RTN 4-0013289.
4-0010781	52 Gardner St	GARDNER ST LOADING DOCK	<ul style="list-style-type: none"> A 55 gallon drum of silver nitrate was spilled during product delivery on September 29, 1994. A Class A-1 RAO was submitted to the MassDEP.
4-0016512	52 Gardner St	NO LOCATION AID	<ul style="list-style-type: none"> Approximately 50 gallons of hydrogen peroxide was spilled onto the pavement of the parking lot during a product transfer. A RAO was submitted on October 5, 2001.
4-0013289	52 Gardner St	CHEMET CORP	<ul style="list-style-type: none"> A RAMC/Class C RAO was submitted on June 14, 2002. On June 6, 2005, MassDEP issued a Notice of Noncompliance/Audit Findings Letter. On October 25, 2005, a Phase II Addendum was submitted to address the items listed in the June 6, 2005 NON/AF. The Phase II Addendum concluded that no additional actions were required except for the continued groundwater monitoring program already in place.

4.4 Local Records

The City of Attleboro Office of Fire Prevention was visited in April 2006. The following table summarizes the records on file at this office for the subject property.

City of Attleboro Fire Prevention Office	
Date	Document Name / Description
No date	Certificate of Registration for above ground and below ground tanks and for various Class A fluids issued by Massachusetts Department of Public Safety – Division of Fire Prevention
No date	Several UST Disposal Cards – State Line Scrap
March 27, 1986	Application for Permit for Removal and Transportation to Approved Tank Yard issued by Massachusetts Department of Public Safety – Division of Fire Prevention (one 3,000-gal gasoline tank removed and transported to State Line Scrap)
April 28, 1986	Application for Permit to Maintain an Existing/New Underground Storage Facility submitted to Massachusetts Department of Public Safety – Division of Fire Prevention
April 29, 1986	Notification for Underground Storage Tanks submitted to Fire Department (re: one 5,000-gallon #4 oil tank and two 8,500-gallon #6 fuel oil tank, installed 3/24/87)

March 11, 1987	3 Applications for Permit for Removal and Transportation to Approved Tank Yard issued by Massachusetts Department of Public Safety – Division of Fire Prevention (two 8,500-gallon tanks and one 5,000-gallon tank removed and transported to State Line Scrap)
March 24, 1987	Notification for Underground Storage Tanks submitted to Fire Department (re: one 10,000-gallon #6 oil tank installed 3/24/87)
March 8, 1988	Certificate of Registration – two 500-gallon aboveground tanks (anhydrous ammonia) & 55-gal. drums (various Class A fluids) issued by Massachusetts Department of Public Safety – Division of Fire Prevention
May 31, 1991	Application for Permit to Maintain an Existing/New Underground Storage Facility submitted to Massachusetts Department of Public Safety – Division of Fire Prevention
July 3, 1992	Data Chart for Tank System Tightness Test – test results for one 10,000-gallon #4 oil tank
March 15, 1995	Final Restricted Emission Status Approval issued by the Massachusetts Department of Environmental Protection (MADEP)
September 24, 1998	Notice of Responsibility issued by MADEP re: oral notification of a release and/or threat of a release of OHM (specifically a leaking fuel oil supply line released 25 gallons of #6 oil onto the boiler room floor).

The following table summarizes the underground and above ground storage tanks that have been registered with the fire prevention office. Records for storage tanks on other lots were not found. Previous reports have suggested the possibility of a UST on Lot 301, the site of the former Goss Laundry. ES&M Personnel checked with the staff at the fire prevention Office several times to investigate this but found no evidence of such tank using the addresses 98 Brook Street, 98 Speedway, and 98 O'Neil Blvd.

City of Attleboro Fire Prevention Office Summary of USTs and ASTs on Subject Property			
Tank Description	Date Installed	Location	Status
Underground Storage Tanks			
10,000 Gallon No. 6 Fuel Oil	3/24/87	South of Building 1	In Use
5,000 Gallon No. 4 Fuel Oil	Around 1946	"	Removed 3/11/87
8,500 Gallon No. 6 Fuel Oil	Around 1946	"	"
8,500 Gallon No. 6 Fuel Oil	Around 1946	"	"
3,000 Gallon Gasoline	9/6/1945	Near Southwest corner of Building 1	Removed 3/27/86
Above Ground Storage Tanks			
1,000 Gallon Anhydrous Ammonia	1968	West of Building 2	Removed
1,000 Gallon Anhydrous Ammonia	"	"	Removed
1,000 Gallon Anhydrous Ammonia	"	"	Removed

The Water Department indicated that the property has been connected to public water and sewer since its development around the turn of the century.

The Attleboro Clerk's Office had a folder with a listing of properties with underground storage tanks. The only reference to Swank was a listing pertaining one 10,000-gallon underground storage tank. No further information was available from the staff.

The City Inspector had a file consisting of various building permits and correspondence pertaining to the subject property. The following summarizes the contents:

City of Attleboro Building Inspector Files	
4/29/1997	Correspondence to Swank from City of Attleboro Inspection Department documenting that the electrical permit granted to Swank for an electrician no longer employed by Swank had been rescinded.
4/15/1998	Permit to raze the 100,000 gallon water tank on lot 296.
1/11/1999	General electrical maintenance permit.
10/29/1999	Permit to rebuild an existing fire escape.
1/7/2000	General electrical maintenance permit.
4/25/2000	Permit to erect a 4' high, chain link fence on Lot 284 (17 Hazel Street).
8/2/2000	Inspection report stating that fence passed inspection.
1/8/2001	General electrical maintenance permit.
2/1/2002	General electrical maintenance permit.

The City's Conservation Commission, Planning Department, and Health Department did not have any files for the subject property.

4.4 Other Environmental Reports

In December of 2003 Sage Environmental was contracted by the ARA to conduct a Phase II Limited Subsurface Investigation of portions of Hazel Street, Pearl Street, School Street, and O'Neil Boulevard proximate to the Swank property. The field investigation for this work was conducted in an effort to (indirectly) evaluate environmental conditions at or near the Swank property. The investigation revealed concentrations of 1,1 dichloroethene, trichloroethylene and vinyl chloride above reporting category RCGW-2. In May 2005, the Redevelopment Authority submitted a Downgradient Property Status identifying Swank and Stern-Leach as possible Potentially Responsible Parties.

5.0 SITE RECONNAISSANCE

On March 23, 2006 ES&M personnel conducted a site reconnaissance visit to observe the current site conditions and record physical evidence of OHM use and/or storage and to interview Mr. Jerry Kasner, a long-time Swank employee who is very familiar with the property. ES&M visually observed the property for evidence of the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products including the presence of transformers and containers. ES&M also conducted a limited visual inspection for Asbestos-Containing Materials (ACM). Access to crawl spaces and the transformer room was limited due to health and safety concerns.

Please refer to Figures 3, 4, and 5 for maps of the interior of the building.

5.1 Exterior Features

The Swank complex includes a two to three story metal sided building that borders Pearl Street and Hazel Street (Building 1); a three story brick building that borders O'Neil Blvd.(Building 2); a one story brick building located between these two buildings that houses the boilers for the complex; and two small cinder block storage sheds. The complex is serviced by municipal water and sewer, and is heated by a steam boiler

system that is supplied with fuel oil stored in a double wall, fiberglass, 10,000-gallon underground storage tank. The main electrical transformers and switching gear for the complex are located on the Swank-owned parcel of land north of Pearl Street; electrical service enters the complex directly across Pearl Street from these transformers.

Around the outside of the building are the following observations:

- To the north, Building 2 extends to Pearl Street. The electrical transformers are located about mid way along Pearl Street. There is an open area between Building One and Pearl Street.
- To the west along Hazel Street, municipal water and natural gas connections enter the newer portion of Building 1. The main access to the site is along Hazel Street. An open parking area occupies the southwestern portion of the site.
- South of the complex are the 10,000-gallon fuel oil UST and two cinder block storage sheds. One shed contains sand and a snow blower, the other contains water treatment chemicals for the boilers. The remnants of a historic water tank are visible to the southeast of the UST. Along the western wall of Building 2 are the dust collectors, a fiberglass above-ground storage tank formerly used to store sodium, hypochlorite, and a steel above-ground tank formerly used to store trichloroethylene (TCE).
- To the east, Building 2 extends to O'Neil Blvd. and occupies the entire block between School Street and Pearl Street. About mid way along O'Neil Blvd. is a small concrete pad that formerly held an above-ground tank containing PCE. There was no evidence of staining or leakage on the pad area.

A 10,000 gallon UST is located in the parking lot south of Building 1. Two fill pipes fitted with spill containment basins were observed. A hatch provided access to the sub-grade UST piping and a sump below the piping was noted to contain water (no oil was observed).

A sodium hypochlorite AST is located west of Building 2. the tank appeared to be empty and no visible staining or leakage was observed.

A large steel AST is located along the southwestern side of Building 2. This tank reportedly stored TCE. The tank was difficult to access as it is boxed in by the dust collection units that surround it. The AST was reported to be empty and no visible leakage or staining was observed.

5.2 Interior Features

The interior of the complex is divided into numerous office and work spaces. This section will describe the various areas of the complex, and will describe in general terms how the various portions of the complex were used in the past. Presently, there are no activities occurring at the property except for minimal building maintenance. Note that reference is made in many areas to wrapped ceiling pipes and/or various types of floor tiles. The scope of work for this ASTM Phase I investigation did not included detailed

inspection or testing of pipe insulation or floor tiles for possible ACM. The observations are intended only to identify possible areas where further testing and/or inspection may be warranted.

BUILDING 1

Building 1 constitutes the west wing of the facility. The building housed office spaces, a cafeteria, credit union, print shop, electric shop, a main transformer room, and a carpentry shop. The boiler room is essentially part of Building 1; however, it appears to have its own foundation and is somewhat separate from Building 1. The building was originally constructed at the turn of the century, and an addition to the south was added in 1955.

First Floor

The first floor included an office supply storage area, where a number of wrapped pipes were observed in the ceiling. Beneath this area is a crawl space that contains steam pipes and sprinkler pipes, which area is accessed through the wood floor. Adjacent to Pearl Street is the electrical room, which houses a number of large transformers and other electrical gear. No information was obtained by ES&M on the history of this equipment and what type of transformer oil is presently used. Also along the north and west portions of the first floor are the former clinic, credit union and print shop. Many of these areas were finished with 4 by 2 ceiling tiles, which precluded observation of any ceiling pipes.

In the south central portion of the first floor is the cafeteria, built in circa 1969. This portion of the building was constructed of cinder block walls. Adjacent to the cafeteria are the carpenter's and plumber's maintenance shops, both of which contained a variety of common cleaning and maintenance chemicals. These chemicals appeared to be generally well kept and organized. This portion of the first floor contained many wrapped pipes in the ceiling.

The boiler room is located on the south side of Building 1. Two boilers covered with suspect asbestos-containing boiler jackets were observed at the east side of the room. The boilers receive No. 6 fuel oil from the 10,000-gallon UST located just south of the boiler room. Compressors were observed west and north of the boilers. Minor oil staining was noted on the concrete floor underneath the compressors and under the northernmost of the two boilers. A fuel oil pump on the west side of the boiler house had a drip pan on the floor which was actively collecting oil. Boiler additive chemicals, stored in 55-gallon drums on spill containment pallets, were observed at several locations in the boiler room. Several smaller 5 to 20 gallon plastic containers of chemicals were also observed, without containment pallets, on the concrete floor. No visible evidence of significant spillage or leakage of boiler chemicals was noted. Two sumps were observed at the west side of the boiler room. These sumps had visible evidence of minor oil residue.

Second Floor

The second floor of Building 1 contained numerous offices. In the older portions of Building 1, the floor tiles appeared to be an older material that may contain asbestos.

The second floor also included the "Pad Room" at the south end of the building, where padded jewelry boxes were made. This area also had possible asbestos floor tiles as well as numerous wrapped pipes in the ceiling.

Third Floor

The majority of this floor was vacant office space. An old vault separates the original portion of the building from that portion constructed in circa 1969. The floor tiles in the original portion appeared old and possibly contain asbestos, while the floor tiles in the new portion likely do not contain asbestos. Most of the wrapped pipes in this portion of the building appeared to be in good condition.

BUILDING 2

Building 2 constitutes the east wing of the facility. The building housed assembly areas, storage and receiving areas, plating and dipping areas, a casting area, polishing rooms, and the former wastewater treatment unit. The majority of this wing was constructed in the mid 1940's, and the southern most tip was constructed sometime after 1951 but before 1977.

First Floor

The first floor is entirely constructed on concrete. At the west side of the building is the former waste water treatment area. A number of above ground tanks were used in this process, and treatment apparently included filtration/separation, and distillation. While several floor drains were observed, Swank personnel said that all drains were connected to internal piping (i.e., none were dry wells or open bottom drains). In the adjacent loading dock area, several pallets of possible asbestos containing floor tiles, and several panels of possible asbestos containing material were observed.

The remainder of the first floor is mostly open space. The ceilings throughout this area contained numerous pipes for electrical, heating, ventilation, compressed air, gas, water and sewer. Some of the drain pipes showed signs of historical leakage (staining and corrosion), and most of the steam heat pipes were wrapped.

Second Floor

Most of the second floor is open, with wooden floors, steel beams and wooden ceilings. There are numerous utility pipes in the ceiling; however, there were fewer wrapped pipes than on the first floor. In the middle portion of this floor was the former plating area. The wood floor in this area was covered with a brick veneer, and several floor drains were observed (which lead to the former waste water treatment area on the first floor). A brown varnish-like residue was observed covering the pipes and the ceiling surfaces above this area, and many of the metal pipes showed evidence of corrosion. Adjacent to the plating area was a small framed-in room that had a wall board that may contain asbestos.

Third Floor

The third floor was formerly used for packaging and storage of raw material. Most of the floor space was open, with wood floors and wood ceilings. As with the second floor, the steam heating pipes were wrapped, but there were fewer pipes than on the first

floor. The central portion of this floor had a large overhead conveyor system for moving product. The very southern tip of this floor was divided into offices that had newer looking floor and ceiling tiles.

5.3 Summary of USTs and ASTs on the Property

Section 4.4 includes a table documenting the USTs and ASTs on file at the City of Attleboro Fire Prevention Office. The following table lists tanks that were not on file with the Fire Prevention Office but whose presence was indicated on reviewed historic insurance maps (provided in Appendix A).

ASTs on Subject Property but not Identified in Fire Department Records			
Tank Description	Date Installed	Location	Status
1,600 Gallon Sodium Hypochlorite	?	West of Building 2	Present
120 Gallon Gas tank	?	Near former water tank	Not present
TCE Tank (possibly 5,000 gallons)	?	West of Building 2	Present, Out of use for past 20 years
1,000 Gallon PCE	?	Eastern side of Bldg. 2 near O'Neil Blvd	Not present, Concrete pad is present

5.4 Polychlorinated Biphenyls (PCBs)

The Swank property contains several electrical components that may have or had the potential to contain PCBs. Since the previous Phase I investigation (Sage Environmental, March 2004) included detailed information regarding the on site electrical equipment and the potential for PCBs, this research was not duplicated by ES&M. To refresh the reader on the previous Phase I findings, the following sections are paraphrased from this report:

"Transformers, electrical equipment or other potential sources of PCBs observed by SAGE personnel during the Site inspection are summarized as follows:

Potential Sources of PCBs 7-16 Hazel Street Attleboro, Massachusetts

Item #	Location	Description
1	Building 1, 1 st Floor, Transformer Room	Three 333 kva and three 200 kva transformers
		Two G&W Gang oil cut-out switches
2	Electrical enclosure on Lot 279, north of Pearl Street	Three large Westinghouse circuit breakers
3	Building 2, 2 nd Floor, Polishing Room	Two General Electric oil cut-out switches
4	Building 1, Boiler Room	Two General Electric and one Cutler Hammer oil cut-out switches

Of the above, documentation provided by SWANK, Inc. indicates that items (1) and (2) in the transformer room and the enclosure on Lot 279 have been flushed and retrofitted with non-PCB (<50 ppm) dielectric oil. However, no documentation was provided indicating the PCB status for the two oil cut-out switches in the second floor polishing room and the three oil cut-out switches in the boiler room. These items may possibly contain PCB dielectric fluids greater than 50 ppm.

Visible evidence of minor oil leakage was observed in the vicinity of two of the three circuit breakers located in the enclosure on Lot 279. The other electrical items had no visible evidence of active leakage or recent spillage. The six transformers in the transformer room were labeled as "non-PCB"; however, none of the other items had any labeling indicating the PCB content. Light oil staining was observed on the concrete floor beneath the transformers. In addition, a light oil film was noted on the surface of the two cut-out switches at the north end of the transformer room. These stains and residues may potentially contain PCBs."

5.5 Staining

The interior of the Swank buildings were inspected by ES&M personnel on March 23, 2006. Since the previous Phase I investigation by Sage Environmental included a detailed inventory of stained surfaces, and because the site use has not changed since the Sage investigation, this inventory was not duplicated by ES&M. To refresh the reader on the previous Phase I findings, the following sections are paraphrased from this report:

"Stained surfaces were observed within interior areas as follows:

- An area of approximately 300 square feet of ink staining in the print shop located on the north end of Building 1;
- A four-foot by three-foot area of oil staining on the tile floor beneath a stamping machine in the "Pad Room" at the south end of the Building 1;
- An approximate 500 square feet area of crusty residual chemical material on the concrete floor in the vicinity of the former treatment tanks in the former waste water treatment area at the west side of Building 2;
- A brown varnish-like residue was observed covering ceiling surfaces above the former "mini-dipping" area located south of the main plating area;
- Oil-stained wood flooring covering approximately 150 square feet was noted in the former polishing room at the southwest side of the building;
- Patchy staining and minor residue was observed on the fiberglass /acid brick floor within the former plating area on the second floor of Building 2;
- Staining was observed on the first floor ceiling below the above-described plating area within Building 2; and
- A ceiling-mounted blower motor located in the second floor stairwell appeared to have leaked a de-minimus quantity of oil.

- Light oil staining was noted on the concrete floor beneath transformers in the transformer room. Also in this room, a light oil film was observed on two cut-out switches. This oil may potentially contain PCBs.

On the exterior of the Site, visible evidence of minor oil leakage was observed in the vicinity of two of the three circuit breakers located in the enclosure on Lot 279.

No evidence of stressed vegetation was noted; however, Site grounds were snow-covered at the time of the inspection."

6.0 FINDINGS

This section summarizes known and/or suspected recognized environmental conditions connected with the subject property:

1. The Swank property contains a number of current and former underground and above ground storage tanks, as listed in Section 4. These tanks stored a variety of hazardous substances and petroleum products.
2. The Swank property and the Swank-owned lot 279 located north of Pearl Street contain electrical equipment that may contain (presently or in the past) PCBs. Site inspections have noted minor staining associated with some of the equipment.
3. Within the interior of the Swank buildings, a number of areas of concern were observed. These areas included stains on the floors from unknown sources, corroded pipes and floor drains.
4. Although not within the scope of this ASTM Phase I ESA, there are numerous areas within the building where asbestos containing materials may be present, including wrapped heating pipes, old floor tiles and old wall panels. In addition, the older portions of Building 1 may contain lead based paint and possibly lead based window glazing.
5. The adjacent property owned by Stern-Leach and located at 49 Pearl Street is a DEP-listed site. Based on an inferred groundwater flow direction to the east/southeast, this DEP-listed site may be hydraulically upgradient of the subject property. As discussed in Section 7, the DEP files for this site were not available for review to evaluate whether subsurface conditions at this site have impacted the subject property.

7.0 OPINION

The Environmental Professional (EP) who prepared this report has rendered the following opinions of the impact on the property of conditions identified in Section 6 above:

1. The current and former storage tanks at the property are a Recognized Environmental Condition (REC). In the opinion of the EP, it is likely that one or more releases have occurred from the storage tanks due to the number of tanks

and their ages. In addition, the Phase II assessment performed in 2003 identified chlorinated solvents in groundwater that likely originated from the Swank property.

2. The electrical equipment that may contain PCBs and where minor staining was noted do not constitute an REC, but rather represent a de minimis condition. It is the opinion of the EP that the possible (but not confirmed) presence of PCBs and the minor staining do not represent a substantial threat to human health or the environment, nor would enforcement actions be initiated by a government agency as a result of this situation. However, the EP does opine that dielectric fluids within the undocumented equipment be tested for PCB content, and if present, the EP recommends the flushing and replacement of the fluids by a licensed contractor.
3. The floor stains and floor drains also represent a de minimis conditions that are not likely a threat to human health or the environment. However, this condition should be noted and addressed in the event of significant building renovation or demolition as the stained material may need to be managed as a hazardous waste. The corroded pipes and the brown varnish-like residue in the ceiling above the former plating area of Building 2 may represent an REC. The composition of the residue is not known, and it is the opinion of the EP that this material could become airborne if disturbed.
4. The possible asbestos containing and lead-based materials are not within the scope of ASTM 1527-05, and therefore are not specifically defined as an REC. The EP has opined that a testing program should be conducted to determine the status of these material and to recommend abatement measures, if necessary.
5. There is insufficient information to determine whether or not the adjacent property owned by Stern-Leach is an REC. This is further discussed in Section 9.

Based on the above opinions, the EP recommends a subsurface testing program of the Swank property. The testing program should include investigation points along Hazel Street in between the Swank and Stern-Leach properties, and investigation points in and around the current and former storage tanks. Testing should be conducted on soil and groundwater for volatile organics, metals and petroleum. In addition, the EP also recommends an indoor testing program to evaluate asbestos and lead. In specific areas within the building, particularly in Building 2 where most of the jewelry manufacturing took place, indoor air testing is recommended to determine if past uses of hazardous materials has affected air quality.

8.0 DATA GAPS

During ES&M's file review at MassDEP, several files pertaining to site located in close proximity to the Swank property were missing. Three files had apparently been borrowed by DEP staff without being signed out while a fourth file was completely missing. The documents contained within these files may have provided valuable information about possible off-site impact to the subject property. Therefore, this missing information represents a Data Gap as defined by ASTM since the EP is unable to render any opinions about off-site sources of contamination.

9.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-05 of the Swank facility located at 6-17 Hazel Street and the associated Swank-owned parcels described in this report. Any exceptions to, or deletions from, this practice are described herein. This assessment has revealed no evidence of recognized environmental conditions in connection with the property except for the following:

1. The current and former storage tanks at the property are a Recognized Environmental Condition. In the opinion of the EP, it is likely that one or more releases have occurred from the storage tanks due to the number of tanks and their ages. In addition, the Phase II assessment performed in 2003 identified chlorinated solvents in groundwater that likely originated from the Swank property.

10.0 REFERENCES

- Phase I Environmental Site Assessment, Marin Environmental, Inc, October 2000
- Phase I Environmental Site Assessment, Sage Environmental, Inc., March 2004
- Phase II Limited Subsurface Investigation, Sage Environmental, Inc., March 2004
- Downgradient Property Status Submittal, Sage Environmental, Inc., May 2005

11.0 ENVIRONMENTAL PROFESSIONAL

This report was completed by Mr. Douglas A. Heely, PG, LSP, and Principal Geologist at **Environmental Strategies and Management, Inc.** of Norton, Massachusetts. Mr. Heely is a Professional Geologist and Licensed Site Professional in the Commonwealth of Massachusetts, and has over 17 years of experience in the environmental field performing Phase 1 assessments, Phase 2 investigations, remedial action planning, field implementation of remedies, UST removals, and other related environmental tasks.

"I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312.21 of 40 CFR part 312. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR part 312."

Douglas A. Heely, PG, LSP
Principal Geologist
Project Manager

Date

12.0 LIMITATIONS

1. The observations described in this report were made under the conditions stated therein. The conclusions presented were based solely upon the services described, and not on scientific procedures which were beyond the scope of described services or the time and budgetary constraints imposed by the Client. Where access to portions of the Site or to structures on the Site was unavailable or limited, ES&M renders no opinion as to the presence of hazardous materials or oil in that portion of the Site or structure.
2. This report was prepared for Attleboro Redevelopment Authority. Third parties may use this report as a general guide of property conditions. However, third party "reliance" of this report is subject to ES&M's Standard Terms and Conditions.
3. Certain information provided by state and local officials, as well as other parties herein referenced, was used to develop this report. The accuracy or completeness of the information provided by these sources was not independently verified.
4. Except as noted herein, ES&M did not perform testing or analyses of any kind to determine the presence or concentration of oil or hazardous materials, including but not limited to petroleum, asbestos, radon, lead paint, or Urea-Formaldehyde Foam Insulation (UFFI).